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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LAURA LEIGH, individually, and WILD  
HORSE EDUCATION, a non-profit  
corporation,

*Plaintiffs,*

v.

INTERIOR BOARD OF LAND APPEALS,  
UNITED STATES DEPARTMENT OF  
INTERIOR, BUREAU OF LAND  
MANAGEMENT, and KG MINING INC.,

*Defendants.*

Case No. 3:25-cv-00039-ART-CSD

**DECLARATION OF J. RAE LOVKO  
IN SUPPORT OF PLAINTIFFS'  
MOTION FOR JUDICIAL NOTICE**

1 I, J. RAE LOVKO, declare that if called as a witness in this action I would competently  
2 testify of my own personal knowledge, as follows:

3 1. I am an attorney with Greenfire Law, PC, counsel for Plaintiffs in the above-titled  
4 action.

5 2. Attached hereto as **Exhibit A** is a true and correct copy of an excerpt from the  
6 Antelope and Triple B Complexes Gather Plan Final Environmental Assessment (2017). This  
7 document was downloaded on August 24, 2025 from the BLM National NEPA Register at  
8 [https://eplanning.blm.gov/public\\_projects/nepa/84367/129074/157029/2017\\_Antelope\\_TripleB\\_](https://eplanning.blm.gov/public_projects/nepa/84367/129074/157029/2017_Antelope_TripleB_Complex_Gather_Plan_508-Final.pdf)  
9 [Complex\\_Gather\\_Plan\\_508-Final.pdf](https://eplanning.blm.gov/public_projects/nepa/84367/129074/157029/2017_Antelope_TripleB_Complex_Gather_Plan_508-Final.pdf).

10 3. Attached hereto as **Exhibit B** is a true and correct copy of an excerpt from the  
11 Bald Mountain Mine Plan of Operations Amendment Juniper Project Draft Environmental  
12 Impact Statement (2023). It contains pages from the main text and Exhibit F thereto. This  
13 document was downloaded on August 24, 2025 from the BLM National NEPA Register at  
14 [https://eplanning.blm.gov/public\\_projects/2011567/200507677/20084171/250090353/\\_Juniper\\_](https://eplanning.blm.gov/public_projects/2011567/200507677/20084171/250090353/_Juniper_DEIS_Main-Text-508.pdf)  
15 [DEIS\\_Main-Text-508.pdf](https://eplanning.blm.gov/public_projects/2011567/200507677/20084171/250090353/_Juniper_DEIS_Main-Text-508.pdf) and [https://eplanning.blm.gov/public\\_projects/2011567/200507677/](https://eplanning.blm.gov/public_projects/2011567/200507677/20084165/250090347/App_F_RFFAs-508.pdf)  
16 [20084165/250090347/App\\_F\\_RFFAs-508.pdf](https://eplanning.blm.gov/public_projects/2011567/200507677/20084165/250090347/App_F_RFFAs-508.pdf).

17 4. Attached hereto as **Exhibit C** is a true and correct copy of an excerpt from the  
18 Bald Mountain Mine Plan of Operations Amendment Juniper Project Final Environmental  
19 Impact Statement (2024). It contains the cover from the main text and pages from Exhibit J  
20 thereto. This document was downloaded on August 24, 2025 from the BLM National NEPA  
21 Register at [https://eplanning.blm.gov/public\\_projects/2011567/200507677/20111335/](https://eplanning.blm.gov/public_projects/2011567/200507677/20111335/251011326/_Juniper_FEIS_Vol_1.pdf)  
22 [251011326/\\_Juniper\\_FEIS\\_Vol\\_1.pdf](https://eplanning.blm.gov/public_projects/2011567/200507677/20111335/251011326/_Juniper_FEIS_Vol_1.pdf) and [https://eplanning.blm.gov/public\\_projects/2011567/](https://eplanning.blm.gov/public_projects/2011567/200507677/20111332/251011323/App_J_DEIS%20Comments.pdf)  
23 [200507677/20111332/251011323/App\\_J\\_DEIS%20Comments.pdf](https://eplanning.blm.gov/public_projects/2011567/200507677/20111332/251011323/App_J_DEIS%20Comments.pdf).

24 5. Attached hereto as **Exhibit D** is a true and correct copy of an excerpt from the  
25 BLM's Wild Horses and Burros Management Handbook, H-4700-1 (2010). This document was  
26 downloaded on August 24, 2025 from BLM's website at [https://www.blm.gov/sites/blm.gov/](https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_H-4700-1.pdf)  
27 [files/uploads/Media\\_Library\\_BLM\\_Policy\\_H-4700-1.pdf](https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_H-4700-1.pdf).

6. Attached hereto as **Exhibit E** is a true and correct copy of a press release from the Bureau of Land Management to begin the FY2022 Triple B Complex Wild Horse Gather (July 11, 2022). This document was downloaded on August 24, 2025 from BLM's website at <https://www.blm.gov/press-release/bureau-land-management-begin-fy2022-triple-b-complex-wild-horse-gather>.

7. Attached hereto as **Exhibit F** is a true and correct copy of the following IBLA decisions and orders, all of which were downloaded on August 24, 2025 the U.S. Department of Interior's website or LEXIS:

(1) **Exhibit F1** is a true and correct copy of *The Mandan, Hidatsa & Arikara Nation*, 196 IBLA 309 (2021), which was downloaded from <https://www.oha.doi.gov/IBLA/Ibladecisions/196IBLA/196IBLA309.pdf>;

(2) **Exhibit F2** is a true and correct copy of *Ctr. for Biological Diversity*, 195 IBLA 298 (2020), which was downloaded from <https://www.oha.doi.gov/IBLA/Ibladecisions/195IBLA/195IBLA298.pdf>;

(3) **Exhibit F3** is a true and correct copy of *Williams Field Services Company*, 193 IBLA 11 (2018), which was downloaded from <https://www.oha.doi.gov/IBLA/Ibladecisions/193IBLA/193IBLA011.pdf>;

(4) **Exhibit F4** is a true and correct copy of *Petroleum Fuels Offshore, LLC*, 189 IBLA 213 (2017), which was downloaded from <http://www.oha.doi.gov/IBLA/Ibladecisions/189IBLA/189IBLA213.pdf>;

(5) **Exhibit F5** is a true and correct copy of *W. Watersheds Project*, 185 IBLA 293 (2016), which was downloaded from LEXIS;

(6) **Exhibit F6** is a true and correct copy of *Cascadia Wildlands*, 188 IBLA 7 (2016), which was downloaded from <http://www.oha.doi.gov/IBLA/Ibladecisions/188IBLA/188IBLA007.pdf>;

1 (7) **Exhibit F7** is a true and correct copy of *Coalition of Concerned National*  
2 *Park Retirees*, 165 IBLA 79 (2005) [https://www.oha.doi.gov/IBLA/Ibladecisions/](https://www.oha.doi.gov/IBLA/Ibladecisions/165IBLA/165IBLA079.pdf)  
3 [165IBLA/165IBLA079.pdf](https://www.oha.doi.gov/IBLA/Ibladecisions/165IBLA/165IBLA079.pdf);

4 (8) **Exhibit F8** is a true and correct copy of *Wyoming Outdoor Council, et al.*,  
5 164 IBLA 84 (2004), which was downloaded from [https://www.oha.doi.gov/](https://www.oha.doi.gov/IBLA/Ibladecisions/164IBLA/164IBLA084.pdf)  
6 [IBLA/Ibladecisions/164IBLA/164IBLA084.pdf](https://www.oha.doi.gov/IBLA/Ibladecisions/164IBLA/164IBLA084.pdf);

7 (9) **Exhibit F9** is a true and correct copy of *Becharof Corp.*, 147 IBLA 117  
8 (1998), which was downloaded from LEXIS;

9 (10) **Exhibit F10** is a true and correct copy of *Robert M. Sayre*, 131 IBLA 337  
10 (1994), which was downloaded from LEXIS;

11 (11) **Exhibit F11** is a true and correct copy of *Frank Stebly*, 109 IBLA 242  
12 (1989), which was downloaded from LEXIS.

13 (12) **Exhibit F12** is a true and correct copy of *Oregon Natural Resources*  
14 *Council*, 78 IBLA 124 (1983), which was downloaded from  
15 <https://www.oha.doi.gov/IBLA/Ibladecisions/078IBLA/078IBLA124.pdf>;

16 (13) **Exhibit F13** is a true and correct copy of *In re Pacific Coast Molybdenum*,  
17 68 IBLA 325 (1982), which was downloaded from  
18 <https://www.oha.doi.gov/IBLA/Ibladecisions/068IBLA/068IBLA325.pdf>;

19 (14) **Exhibit F14** is a true and correct copy of an order issued in *Frank*  
20 *Campbell*, 2018-0072 (2019), which was downloaded from  
21 [https://www.oha.doi.gov/IBLA/Dispositives/2019%20Dispositive%20Orders/Mar](https://www.oha.doi.gov/IBLA/Dispositives/2019%20Dispositive%20Orders/March/2018-0072.pdf)  
22 [ch/2018-0072.pdf](https://www.oha.doi.gov/IBLA/Dispositives/2019%20Dispositive%20Orders/March/2018-0072.pdf);

23 (15) **Exhibit F15** is a true and correct copy of an order issued in *Elyse R.*  
24 *Gardner Walsh, Laura Leigh & Wild Horse Education* (2018), which was  
25 downloaded from [https://www.oha.doi.gov/IBLA/Dispositives/2018%](https://www.oha.doi.gov/IBLA/Dispositives/2018%20Dispositive%20Orders/January/2018-0035.pdf)  
26 [20Dispositive%20Orders/January/2018-0035.pdf](https://www.oha.doi.gov/IBLA/Dispositives/2018%20Dispositive%20Orders/January/2018-0035.pdf).  
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1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the  
2 United States of America that the foregoing is true and correct.

3 Dated this 29th day of August, 2025

4 /s/ Jennifer Rae Lovko  
5 J. Rae Lovko  
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